

September 9, 2019

Ms. Amy Zimpfer  
Associate Director, Air Division  
Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Dear Ms. Zimpfer:

The California Air Resources Board (CARB) is hereby forwarding a letter of commitment to the U.S. Environmental Protection Agency (U.S. EPA) from the South Coast Air Quality Management District (District). CARB staff is also providing further detail in response to U.S. EPA's request for clarification regarding approval of the transportation conformity budgets in the *2018 Updates to the California State Implementation Plan* (2018 Update) submitted to them on December 5, 2018.

On August 2, 2019, the District submitted a letter to CARB committing to adopt contingency measures to be triggered in the event the Coachella Valley fails to attain the 75 parts per billion (ppb) 8-hour ozone standard (Ozone Standard) or meet reasonable further progress (RFP) milestones. The District's commitment adheres to the latest U.S. EPA guidance based on the U.S. Court of Appeals for the Ninth Circuit opinion in *Bahr v. EPA*, 836 F.3d 1218 (9th Cir. 2016). The District will adopt the rule(s) and/or rule amendment(s) and transmit them to CARB which will allow CARB to submit them to U.S. EPA not later than one year after the date of U.S. EPA's conditional approval of the Coachella Valley State Implementation Plan (Ozone SIP). The District commitment together with CARB's 2018 Update submittal demonstrating ongoing reductions in the Coachella Valley from State mobile programs will allow U.S. EPA to approve the Ozone SIP.

The 2018 Update included transportation conformity emission budgets (budgets) for the Ozone Standard in the Coachella Valley. In the 2018 Update submittal letter, CARB requested that U.S. EPA limit the approval to last until the effective date of future U.S. EPA adequacy findings for replacement budgets. Specifically, CARB staff is requesting that upon U.S. EPA approval of EMFAC2017, as anticipated in the third quarter of 2019, the transportation conformity emission budgets will be outdated and will need to be revised using EMFAC2017 prior to the expiration of the grace period

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established by U.S. EPA. CARB staff will submit updated budgets to U.S. EPA by the second quarter of 2021.

Without the ability to replace the applicable emission budgets with submitted budgets found adequate using the budget adequacy process, the benefits of using the updated data may not be realized for a year or more after the SIPs are submitted, due to the SIP approval process. We appreciate U.S. EPA's willingness to work with CARB staff in our efforts to utilize motor vehicle emission budgets based on the most up-to-date, accurate data as soon as possible upon availability.

If you have any questions, please contact Ms. Sylvia Vanderspek, Chief, Air Quality Planning Branch, at (916) 324-7163 or by email at [Sylvia.Vanderspek@arb.ca.gov](mailto:Sylvia.Vanderspek@arb.ca.gov).

Sincerely,



Dr. Michael T. Benjamin, Chief  
Air Quality Planning and Science Division

Enclosure

cc: Mr. Wayne Nastri  
Executive Officer  
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Ms. Sylvia Vanderspek  
Branch Chief  
Air Quality Planning Branch  
Air Quality Planning and Science Division

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bcc: (External, with Enclosure, via email)

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(Hard copies)

AQPSD Chron (w/ Enclosure)  
SIP Library (w/ Enclosure)

AQPS Assignment #10650

X:\South Coast 2016 AQMP\Coachella Contingency 2019 submitted 8-2-2019\Sharepoint\Coachella Valley contingency 8-9-2019.docx

Enclosure can be found at:

X:\South Coast 2016 AQMP\Coachella Contingency 2019\Sharepoint\Commitment letter R. Corey 8.2.19.pdf